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17.2.2013
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Pacific Highway Upgrade - Woolgoolga + Ballina Project
Application no. (SSI - 4963)

Section: "Preferred" route through Clarence Valley (Glenugie to Harwood)

Attention: Director, Infrastructure Projects

fax no. 02 9228 6455.

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Dear Sir/Madam,

I submit the following in opposition to the "preferred" route of the Pacific Highway Upgrade through the Clarence Valley (Glenugie to Harwood). A major divergence from the existing highway, it cuts a swathe through an extremely ecologically sensitive area, and will have significant impact. As the proposal requires assessment and a decision on an approval under the Environment Protection and Biodiversity Conservation Act 1999, let it be known that in excess of 80 threatened species of flora and fauna will be impacted if the "preferred" route is chosen, including the endangered coastal emu. I advocate the original orange option, which generally approximates the existing highway with small bypasses at Grafton and Ulmarra. As stated in RMS Biodiversity Assessment, the Summerville Range and associated footslopes, occurring within the Glenugie to Harwood section, remain hitherto undisturbed and unfragmented. The "preferred" route approximates a number of significant wetlands in the Coldstream River Catchment. They should be fully avoided.

If RMS is to remain true to its biodiversity policy re road development and "avoid impacts on habitat through the planning process" then the "preferred" route will be eschewed and the original orange option re-endorsed. Mitigation and offset measures fail to address the obvious, unavoidable reality that once habitat is gone, it's gone. (Translation of "net loss of biodiversity")

It is long past time that ecological considerations be given their due, as social and economic considerations have undoubtedly played more than a leading role

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in contributing to Australia's "second great vertebrate extinction event" (Professor Tim Flannery et al.)

As stated in the RMS Biodiversity Assessment, "In general the types of potential impacts to biodiversity during construction and operation (of the project) include":

- loss of native vegetation (including habitat for Threatened Flora and Threatened fauna, and Threatened ecological communities)

- Loss of habitat for fauna (including food resources, shelter and refuge areas during breeding and non-breeding life-cycle events)

- Direct mortality of native fauna

- loss of connectivity for flora and fauna (including links to national parks and state forests and identified local and regional wildlife corridors)

- Fragmentation of habitat and resulting edge effects from road noise, altered light and wind levels

- Changes to water quality as a result of works in, or adjacent to, aquatic habitats, and alterations to natural hydrological flows.

- Invasion and spread of weeds and pest fauna species.

- Potential spread of disease pathogens.

The beauty of it is that most of these impacts can be totally avoided in the Clarence Valley section by adopting the orange option. Compare this to "monitoring the effectiveness of mitigation measures," i.e. translate as "monitoring the decline of species and too late to move the highway when results of monitoring are known."

The RMS EIS (Environmental Impact Statement) continues: "As the project would result in clearing of native vegetation including critically endangered ecological communities, Threatened species and their habitat, it is unlikely that the objective of maintaining or improving biodiversity values can be met.....

There is no conclusive scientific knowledge on the ability of each of the assessed species to sustain a loss of the magnitude expected or resilience to change including adaptation to the proposed mitigation measures ~~as~~ such there is a risk that the project could have a significant impact on several Threatened flora and fauna, most notably the coastal ~~end~~ endangered population and the critically endangered ~~lowland~~ rainforest of Subtropical Australia present in the study area." This in itself speaks to the wisdom of adopting the original orange option and the folly of following the "preferred" route.

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Further to the question of the Coastal Emu, which only numbers approximately 110-120 individuals, and has been in decline; the RMS EIS continues: "In theory, access to identified important habitats can be provided for emus via appropriately placed and adequately sized crossing structures (i.e. bridges and arches) in addition to exclusion fencing, which should also act as directional forcing leading to the crossing structures. However there is a risk in this approach in that it relies on effectiveness of these mitigation measures when there is no current scientific evidence to indicate that wild emus are capable of finding and using crossing structures or can be directed by fencing. In the absence of scientific certainty, the benefit of providing crossing structures remains to be proven." (Page 437)

Given that more than 80 threatened species of flora and fauna, including the coastal endangered emu, will be impacted if the "preferred" route is chosen, and that the research and documentation prepared for the RMS, indicates that the "preferred" route through the Clarence Valley is totally unacceptable on ecological grounds, I conclude that the only acceptable route for the Glengugie to Kerwood Pacific Highway upgrade is the original orange option.

Thank you for your wise and considered decision,
I remain yours,

most sincerely,

Gabrielle Barto.